

# **Exhibit 3**

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

---

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**NAACP PLAINTIFFS' INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.1(b)(3),  
Plaintiffs North Carolina State Conference of the NAACP, Common Cause, Mitzi  
Reynolds Turner, Dawn Daly-Mack, Hollis Briggs, Corine Mack, Calvin Jones, Linda  
Sutton, and Syene Jasmin (collectively, “NAACP Plaintiffs”) hereby supplement their

May 8, 2024, initial disclosures and August 9, 2024, supplemented initial disclosures as follows.

These initial disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information, or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making the following disclosures, Plaintiffs do not represent that every individual or entity identified herein necessarily possesses such information. Nor do Plaintiffs represent that they have identified every witness, document, or tangible thing that may support their claims or defenses in this action.

Plaintiffs reserve the right to supplement and/or amend these disclosures based on further investigation and discovery conducted in this case, or any other reasons impacting the accuracy and completeness of these disclosures. Plaintiffs further reserve the right to rely on any witnesses, documents, and other evidence identified by State Board Defendants and Legislative Defendants in their Initial Disclosures. By making these disclosures, Plaintiffs do not waive their rights to object to the admissibility or any information disclosed herein.

- 1. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i));**

1. Deborah Dicks Maxwell, President, North Carolina State Conference of the NAACP  
c/o Plaintiffs' counsel

President Maxwell has general knowledge of the factual allegations pertaining to the organization that are stated in Plaintiffs' Complaint.

2. Bob Phillips, Executive Director of Common Cause North Carolina  
c/o Plaintiffs' counsel

Executive Director Phillips has general knowledge of the factual allegations pertaining to North Carolina's redistricting in 2023 and historically and the allegations pertaining to Common Cause that are stated in Plaintiffs' Complaint.

3. Individual Plaintiffs who have knowledge of the factual allegations pertaining to them that are stated in Plaintiffs' Complaint and may be contacted through undersigned counsel:

- a. Mitzi Reynolds Turner
- b. Dawn Daly-Mack
- c. Hollis Briggs
- d. Corine Mack
- e. Calvin Jones
- f. Linda Sutton
- g. Syene Jasmin

4. Members and staff of the North Carolina Board of Elections who are Defendants in their official capacities, all of whom may be contacted through counsel of record Terrance Steed at the North Carolina Department of Justice, P.O. Box 629, Raleigh, NC 27602:

- a. Karen Brinson Bell, Executive Director
- b. Paul Cox, General Counsel

5. Leadership from the state conference and local chapters of the North Carolina NAACP serving statewide and/or in areas at issue in this lawsuit, and specifically:

Mr. Keith Rivers  
Pasquotank County NAACP Branch President  
Contact: NAACP Plaintiffs' counsel

Mr. Courtney Patterson  
1<sup>st</sup> Vice President of the NC NAACP  
Lenoir County NAACP Branch President  
Contact: NAACP Plaintiffs' counsel

Ms. Kay Brown  
Greensboro NAACP Branch President  
Contact: NAACP Plaintiffs' counsel

6. Members of the North Carolina General Assembly who are Defendants in their official capacity and have knowledge of the factual allegations in Plaintiffs' Complaint, all of whom may be contacted through counsel of record Phillip Strach, 301 Hillsborough Street, Suite 1400, Raleigh, NC 27603:

- a. State Senator Philip Berger, President Pro Tempore of the North Carolina Senate
- b. State Representative Timothy Moore, Speaker of the North Carolina House of Representatives
- c. State Representative Destin Hall, Chair of the House Redistricting Committee
- d. State Senator Warren Daniel, Co-Chair of the Senate Redistricting and Elections Committee
- e. State Senator Ralph Hise, Co-Chair of the Senate Redistricting and Elections Committee
- f. State Senator Paul Newton, Co-Chair of the Senate Redistricting and Elections Committee and a Defendant

7. Other members of the North Carolina General Assembly who are serving or previously served on the North Carolina House Standing Committee for Redistricting or the North Carolina Senate Redistricting and Elections Senate Standing Committee, including:

Rep. Jason Saine (HD-97)  
Contact: Legislative Defendants' counsel

Rep. Sarah Stevens (HD-90)  
Contact: Legislative Defendants' counsel

8. Brent Woodcox

Brent Woodcox is Senior Policy Council to President Pro Tempore Philip Berger. On information and belief, he has information and knowledge regarding the legislative history, discriminatory purpose, and/or dilutive effect of the Redistricting Plans, and/or the role of racial considerations in the drawing of the Redistricting Plans.

9. Blake Springhetti

Blake Springhetti was hired by members of the North Carolina General Assembly as a redistricting consultant to assist with the 2023 redistricting process. On information and belief, he has information and knowledge regarding the legislative history, discriminatory purpose, and/or dilutive effect of the Redistricting Plans, and/or the role of racial considerations in the drawing of the Redistricting Plans.

10. Current and/or former members of the North Carolina General Assembly, their staff, and any third-party consultants, who may have information and knowledge regarding the legislative history, discriminatory purpose, and/or dilutive effect of the Redistricting Plans, and/or the role of racial considerations in the drawing of the Redistricting Plans. This includes incumbent members in the challenged districts. This includes those individuals issued subpoenas by Legislative Defendants to date (Rep. Chaudhuri and Rep. Pricey Harrison), as well as:

Sen. Kandie D. Smith (SD-5)  
Phone: (919) 715-8368  
Email: Kandie.Smith@ncleg.gov  
Address: 16 West Jones Street, Rm. 1113  
Raleigh, NC 27601

11. Individuals and third-party voter education organizations who have not yet been identified and who may have information about the discriminatory purpose and/or dilutive effect of the Redistricting Plans.

12. Other third parties who may have information relevant to the lawsuit, including:

Dallas Woodhouse  
917 Tanworth Dr.,  
Raleigh, NC 27615

James Blaine II  
4613 Stormy Gale Rd.,  
Raleigh, NC 27614

Tyler Daye  
Common Cause North Carolina  
Policy and Civic Engagement Manager  
Contact: NAACP Plaintiffs' counsel  
Mr. Daye has information and knowledge regarding the 2021 and 2023 public redistricting processes and redistricting in North Carolina, including map-drawing and demography, as well as Common Cause's engagement in redistricting in the state.

Rev. William Arthur Kearney  
103 Christmas Rd.  
Warrenton, NC 27589  
billkearney777@gmail.com  
Rev. Kearney has information and knowledge regarding the Black Belt of North Carolina.

Former Rep. George Kenneth "G.K." Butterfield, Jr.  
3501 South Meade Pl. NW  
Wilson, NC 27896  
Rep. Butterfield has information and knowledge regarding the Black Belt of North Carolina and the political climate of North Carolina generally.

13. Expert witnesses, to be identified pursuant to the Court's scheduling order.

14. Individuals identified by State Board Defendants and Legislative Defendants.

**2. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii));**

1. The statements of votes cast by voters in elections in North Carolina that are maintained by the North Carolina State Board of Elections;
2. Turnout and voter registration data for North Carolina that are maintained by the North Carolina State Board of Elections (public domain);
3. United States Census data for North Carolina (public domain);
4. Social media and internet postings and comments made in reference to North Carolina redistricting (public domain);
5. News articles and other documents concerning redistricting, racial controversies, and other issues of interest to North Carolina (public domain);
6. Internet websites created or maintained by North Carolina, its members and staff (public domain);
7. Evidence identifying the attendees at redistricting meetings for North Carolina;
8. Recordings of the North Carolina General Assembly's sessions and public hearings relating to the redistricting of North Carolina (public domain);
9. Reports, articles, and other documents describing or analyzing the history of discrimination in North Carolina (public domain);
10. Statements made to the press by members of the North Carolina General Assembly in connection with redistricting (public domain);
11. Demographic information, election results, and other data pertaining to North Carolina (public domain);



12. Statistical analyses of racially polarized voting in North Carolina;

13. Maps and other documents reflecting districting plans, including historical plans and data, for North Carolina (public domain / North Carolina General Assembly).

3. **A computation of each category of damages claimed by the disclosing party—who must also make available for inspect and copying as under Rule 34 the documents or other evidentiary materials, unless privileged or protected from disclosure, on which each computation is based, including material bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii)).**

Plaintiffs are not seeking economic damages, but reserve the right to seek reimbursement for reasonable attorneys' fees, litigation expenses (including reasonable expert witness fees and expenses), and costs. The future amount of any such fees and costs is unknowable at this time.

4. **For inspection and copy under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment (Fed. R. Civ. P. 26(a)(1)(A)(iv)).**

Not applicable.

Plaintiffs expressly reserve the right to supplement the foregoing as additional information is learned through discovery or otherwise.

Dated: September 20, 2024

Respectfully submitted,

*/s/ Hilary Harris Klein*

---

Hilary Harris Klein

**HOGAN LOVELLS US LLP**

J. Tom Boer\*  
Corey Leggett\*  
Olivia Molodanof\*  
Madeleine Bech\*  
4 Embarcadero Center, Suite 3500  
San Francisco, CA 94111  
Telephone: 415-374-2300  
Facsimile: 415-374-2499  
tom.boer@hoganlovells.com  
corey.leggett@hoganlovells.com  
olivia.molodanof@hoganlovells.com

Jessica L. Ellsworth\*  
Misty Howell\*  
Odunayo Durojaye\*  
555 Thirteenth Street, NW  
Washington, DC 20004  
Telephone: 202-637-5600  
Facsimile: 202-637-5910  
jessica.ellsworth@hoganlovells.com

Harmony Gbe\*  
1999 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: 310-785-4600  
Facsimile: 310-785-4601  
harmony.gbe@hoganlovells.com

\*Appearing in this matter by Special  
Appearance pursuant to L-R 83.1(d)

**SOUTHERN COALITION FOR  
SOCIAL JUSTICE**

Jeffrey Loperfido (State Bar #52939)  
Hilary Harris Klein (State Bar #53711)  
Christopher Shenton (State Bar #60442)  
Mitchell D. Brown (State Bar #56122)  
5517 Durham Chapel Hill Blvd.  
Durham, NC 27707  
Telephone: 919-794-4213  
Facsimile: 919-908-1525  
hilaryhklein@scsj.org  
jeffloperfido@scsj.org  
chrissshenton@scsj.org  
mitchellbrown@scsj.org

**NAACP**

Janette Louard\*\*  
4805 Mt. Hope Drive  
Baltimore, MD 21215  
Tel: (410) 580-5777  
jlouard@naacpnet.org

\*\*Application for Special Appearance  
forthcoming

### **CERTIFICATE OF SERVICE**

I certify that on September 20, 2024, I sent the foregoing via email to all counsel of record.

/s/ Hilary Harris Klein  
Hilary Harris Klein